Cincinnati Bell Telephone®

David L. Meier
Director
Legislative & Regulatory Planning

201 E. Fourth Street
P. O. Box 2301
Cincinnati, Ohio 45201-2301
Phone: (513) 397-1393
Fax: (513) 241-9115

August 16, 1996

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Mr. William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D. C. 20554

In the Matter of:

	)	
Telephone Number Portability	)	CC Docket No. ~~96-115~~ ~~116~~ 95
	)	95-116

Dear Mr. Caton:

Enclosed are an original and sixteen copies plus two public copies of the Comments of Cincinnati Bell Telephone Company in the above referenced proceeding. A duplicate original copy of this letter and attached Comments is also provided. Please date stamp this as acknowledgment of its receipt and return it. Questions regarding these Comments may be directed to Ms. Patricia Rupich at the above address or by telephone on (513) 397-6671.

Sincerely,

David L. Meier

David L. Meier

Enclosure

cc: Competitive Pricing Division (two copies)
Wanda M. Harris, Competitive Pricing Division (diskette)

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Telephone Number Portability	)	**CC Docket No. 95-116**
	)	**RM 8535**

COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY

Christopher J. Wilson
FROST & JACOBS
2500 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202
(513) 651-6800

Thomas E. Taylor
Sr. Vice President-General Counsel
Cincinnati Bell Telephone Company
201 East Fourth Street, 6th Floor
Cincinnati, Ohio 45202
(513) 397-1504

Attorneys for Cincinnati Bell
Telephone Company

Dated: August 16, 1996

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Summary

In these comments, CBT generally concurs with the Commission's classification of costs into three categories (i.e., shared costs, carrier-specific direct costs, and carrier-specific indirect costs), but submits that the costs included in each category must be more clearly identified. As to the magnitude of the costs involved in implementing number portability, CBT notes that it will be impossible to determine with any certainty the total cost of implementing number portability, at least until the number portability regions are established by the NANC, the architecture is selected, and the querying method is conclusively established. CBT does, however, offer some general observations about the magnitude of the carrier-specific costs that are likely to be involved. As to the cost recovery issues raised by the Commission, CBT maintains that all costs (including a portion of indirect costs) a carrier realizes due to implementing number portability should be recovered on a competitively neutral basis. More specifically CBT suggests the recovery of all number portability costs through a mandatory end-user surcharge collected by all carriers providing local exchange service, including CMRS providers. CBT also provides a detailed description of how such an end-user surcharge would work. In short, CBT believes a mandatory end-user surcharge is the only competitively neutral method by which to recover number portability costs. This surcharge should be set at a level sufficient to recover all shared costs and all carrier-specific costs attributable to number portability. Any cost recovery method that does not allow carriers to recover all of their costs, and does not apply equally to end-users, will not be competitively neutral and may result in an unconstitutional taking of property.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
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Telephone Number Portability	)	**CC Docket No. 95-116**
	)	**RM 8535**

COMMENTS OF CINCINNATI BELL TELEPHONE COMPANY

Cincinnati Bell Telephone Company ("CBT"), an independent, mid-size local exchange carrier (LEC), submits these comments in response to the Commission's July 2, 1996 Further Notice of Proposed Rulemaking ("FNPRM") in the above-captioned proceeding.[1] The FNPRM seeks comment on various cost recovery issues associated with the implementation of long-term number portability.

I. Classification of Costs Involved In Providing Long-Term Service Provider Portability

A. Types of Costs

In the FNPRM, the Commission tentatively concluded that there are three types of costs involved in providing long-term service provider portability.[2] CBT generally concurs with the

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[1] Telephone Number Portability, CC Docket No. 95-116, First Report and Order and Further Notice of Proposed Rulemaking, (FCC 96-286), released July 2, 1996.

[2] The FNPRM at para. 208 classifies number portability costs as follows: (1) costs incurred by the industry as a whole, such as those incurred by the third party administrator to build, operate, and maintain the databases needed to provide number portability (hereinafter referred to as "shared costs"); (2) carrier-specific costs directly related to providing number portability, e.g., the costs to purchase the switch software necessary to implement number portability (hereinafter referred to as "carrier-specific direct costs"); and (3) carrier-specific costs not directly related to number portability, e.g., the costs of network upgrades necessary to implement a database method (hereinafter referred to as "carrier-specific indirect costs").

Commission's classification of costs into these three categories (i.e., shared costs, carrier-specific direct costs, and carrier-specific indirect costs), but submits that the costs included in each category must be more clearly identified. The Commission provides specificity to the definition of shared costs by dividing such costs into three subcategories: (a) non-recurring costs, including the development and implementation of the hardware and software for the database; (b) recurring (monthly or annually) costs, such as maintenance, operation, security, administration, and physical property associated with the database; and (c) costs for uploading, downloading, and querying number portability database information.[3] CBT agrees with this classification of shared costs, although the Commission should clarify that non-recurring costs are recoverable just as any capital cost item would be recoverable.

The Commission's definition of carrier-specific direct costs does not contain the same level of detail as the shared cost definition. CBT believes these costs must be clearly defined to avoid any confusion as to what types of costs are direct versus indirect, particularly if a different cost recovery mechanism is prescribed for each type of cost. CBT submits that carrier-specific direct costs include all costs that a carrier incurs solely to implement number portability (i.e., if not for the requirement to offer number portability, the carrier would not otherwise make the changes to its switches, support systems, etc.) and that will not be used to provide new or enhanced services. This would include costs such as the right-to-use fees for the LNP software for all switches and STPs which must be capable of providing number portability; hardware costs for Global Title Translations and the addition of a Service Control Point (if the

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[3] FNPRM at para. 216.

regional LNP architecture does not include an SCP); upgrades to Operational Support Systems (OSS) to accommodate number portability requirements; and LIDB modifications.

Carrier-specific indirect costs have been identified by the Commission as costs, such as upgrading to SS7 or adding intelligent network or advanced intelligent network capabilities, which will enable the carrier to improve its existing services or offer new services it otherwise would not be able to provide.[4] CBT submits that although it may not be unreasonable to distinguish direct costs from indirect costs, it may ultimately be easier to eliminate the indirect cost category and simply assign a portion of the cost of network upgrades to the direct cost category. For example, a small carrier that must upgrade to SS7 and add AIN capabilities to provide number portability, but which otherwise would not make such an investment, would be able to assign the entire cost of AIN to the direct cost category. On the other hand, a carrier that already has SS7 and AIN but must upgrade its switches to the next generic in order to accommodate number portability may be able to consider only part of its upgrade costs as a direct cost of number portability. In this case it would be necessary to determine when the carrier would have been scheduled to upgrade to the next generic. If the upgrade occurs earlier than it would have without the requirement to provide number portability, the carrier would assign to the direct cost category a portion of the upgrade cost equal to the opportunity cost incurred in making this investment earlier than it would otherwise have been made.

B. Magnitude of the Costs

Until the number portability regions are established by the NANC, the architecture is selected, and the querying method is conclusively established, it is impossible to determine with

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[4] FNPRM at para. 227.

any certainty the total cost of implementing number portability. However, some general observations can be made about the magnitude of the carrier-specific costs.

As indicated above, carriers will incur various types of direct costs. Which type of direct cost will be more significant for a particular carrier will depend primarily upon the size of the carrier. The cost of the LNP software will be roughly the same for a particular type of switch, although larger carriers are more likely to be able to negotiate discounts from the manufacturers. Larger carriers, however, will have more switches to update, thus increasing their total software cost. However, on a per line basis, the cost may be less for the larger carriers.

Based on information available to CBT at this time, it appears that OSS upgrades can be expected to be about the same regardless of the size of the carrier. As a result, for small and mid-size carriers OSS upgrades could constitute the majority of their number portability costs. At this time, CBT estimates that OSS upgrades could be as much as two-thirds of its carrier-specific costs. When spread over a small customer base, the per line cost of these upgrades for small and mid-size companies will be significantly higher than for large companies.

The carrier-specific indirect costs will vary depending on the type of network a carrier currently has in place. Clearly, a carrier that currently does not utilize SS7, or does not have IN or AIN capabilities, would incur significant costs to upgrade its network to provide number portability. For such a carrier, this could be the most significant cost of implementing number portability. To require such a carrier to bear the entire cost of these upgrades, which presumably could not be justified prior to such mandate, does not appear to be in keeping with the competitively neutral standard the Commission is required to observe.

II. Competitively Neutral Cost Recovery

As noted in the FNPRM,[5] Section 251(e)(2) of the Telecommunications Act of 1996 (the "1996 Act") requires that the costs of establishing number portability be borne by all telecommunications carriers on a "competitively neutral basis." The Commission seeks comment on its tentative conclusion that the "competitively neutral" standard in Section 251(e)(2) applies only to costs directly related to number portability (i.e., shared costs and carrier-specific direct costs), and not to carrier-specific indirect costs, such as upgrades to SS7 or AIN technologies.[6] CBT believes that all costs a carrier realizes due to implementing number portability should be recovered on a competitively neutral basis. CBT submits that it may be appropriate to factor out the offsetting benefits a carrier realizes due to non-number portability specific upgrades, such as AIN, but that a carrier should be able to recover all costs attributable to number portability on a competitively neutral basis. That is why CBT is suggesting that carriers be permitted to assign a portion of any upgrade costs to the direct cost category, rather than trying to differentiate between direct and indirect costs.

The Commission also tentatively concludes that Section 251(e)(2) does not address recovery of number portability costs from consumers, but only the allocation of such costs among carriers. However, CBT submits that the Act in no way prohibits recovery of such cost from consumers. The Act gives the Commission broad authority to determine the appropriate recovery mechanism, as long as the recovery mechanism is competitively neutral.

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[5] FNPRM at para. 209.

[6] FNPRM at para. 209.

The Commission also tentatively concludes that any long-term cost recovery mechanism must comply with two principles: (1) it should not give one service provider an appreciable, incremental cost advantage over another service provider when competing for a specific subscriber; and (2) it should not have a disparate effect on the ability of competing service providers to earn a normal return.[7] CBT submits that these principles are only two of four principles necessary for a competitively neutral cost recovery mechanism. The third principle is that carriers must be able to recover all costs they incur to implement number portability. Indeed, a failure to allow full cost recovery may result in an unconstitutional taking of property. And fourth, all end-users must be equally impacted so that the recovery of number portability costs does not influence an end-user's choice of carrier. Thus, CBT submits that all number portability costs should be recovered from end-users through a mandatory flat-rate monthly surcharge collected by all carriers providing local exchange service, including CMRS providers.[8] As noted in the FNPRM, "Congress has recognized that number portability will lower barriers to entry and promote competition in the local exchange marketplace" and the pro-competitive framework of the 1996 Act is intended to "secure lower prices and higher quality services for American telecommunications consumers."[9] Because Congress has decided that number portability is an integral part of achieving this pro-competitive framework, it is appropriate that

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[7] FNPRM at para. 210.

[8] The CMRS providers that should be included are those who are required to provide number portability under the First Report and Order in CC Docket No. 95-116, at para. 155.

[9] First Report and Order, CC Docket No. 95-116, at para. 2.

all telecommunications end-users who will benefit from the increased competition should pay for the implementation of number portability.

III. Cost Recovery Via An End-User Surcharge

The FNPRM sets forth several different options for recovering the costs associated with number portability. The Commission tentatively concludes that shared costs should be allocated among telecommunications carriers in proportion to each carrier's share of gross telecommunications revenue minus charges paid to other carriers.[10] The Commission reaches no tentative conclusions on the recovery of direct costs, although it suggests two possible ways of recovering direct costs: (1) each carrier bears its own costs; or (2) pool all carriers' direct costs and allocate them among the carriers.[11] Finally, the Commission tentatively concludes that each carrier should bear its own indirect costs.[12]

CBT submits that the Commission should not allocate costs based on gross revenue or gross revenue less payments to other carriers. An allocation based on gross revenue becomes complex as decisions must be made as to what constitutes telecommunications revenue, especially as the telecommunications marketplace evolves. In addition, a gross telecommunications revenue allocation would have to be continually updated as new companies enter the market and their share of the revenue grows. Likewise, as companies, new and old drop out of the market, adjustments would be necessary. Carriers would be uncertain of their

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[10] FNPRM at para. 213.

[11] FNPRM at para. 221.

[12] FNPRM at para. 226.

share of the costs from month to month or year to year. Moreover, any attempt to fix shares based upon today's proportion of gross revenue would not be competitively neutral because it would require incumbent LECs to bear the majority of the costs, even if their share of the revenue subsequently declines.

An allocation based on gross telecommunications revenue less payments to other carriers, is even more problematic. It would not be competitively neutral to treat expenses differently depending on their source. An expense incurred by an incumbent LEC to build its network to provide a telecommunications service should be treated no differently than an expense incurred by a new entrant to purchase unbundled elements from an incumbent LEC in order to provide the telecommunications service. In both cases the expenses are a cost of doing business, therefore, it is inappropriate to deduct one type of expense but not the other. Furthermore, such an allocation method would be a disincentive for new entrants to become facilities-based competitors. If they build their own facilities, the expenses they incur relative to those facilities would not be deducted from their gross revenues, whereas if they purchase unbundled elements from the incumbent LEC, they can deduct those expenses from their gross revenue and reduce their share of number portability costs. Thus, the Commission's proposed allocation method would not be competitively neutral. Nor would it promote facilities-based competition.

As stated previously, CBT supports the recovery of all number portability costs through a mandatory end-user surcharge collected by all carriers providing local exchange service, including CMRS providers. Under this method of cost recovery, there is no need to allocate or reallocate costs among carriers. All carriers will be fully reimbursed for the costs they incur in providing number portability. It adds certainty and predictability for carriers and consumers and is competitively neutral. In addition, this method avoids the complexities involved with jurisdictional separations that will occur with methods which require each carrier to bear its own costs. Finally, any method that leaves carriers to bear the costs without mandatory recovery from end-users disadvantages incumbent LECs which must have all rates approved by regulators whereas, new entrants will be free to recover their share of the costs as they see fit, including cross-subsidizing it with revenue from other parts of their business (e.g., wireless, cable or long distance revenues).

A. Calculation of the End-User Surcharge

CBT recommends that all number portability cost be recovered via a monthly surcharge paid by end-users on a per number basis. Each regional LNPA would calculate the relevant surcharge for its region and handle all administrative responsibilities. The surcharge would be collected by all carriers providing local exchange service, including CMRS providers. The surcharge would be adjusted annually to reflect changes in the number of telephone numbers assigned to end-user customers, updated estimates of shared costs, and additional costs attributable to new providers of number portability.

More specifically, the surcharge would consist of three components: 1) a non-recurring shared cost surcharge; 2) a recurring shared cost surcharge; and 3) a pooled carrier cost surcharge. Set forth below is a description of each component.

(1) Non-Recurring Shared Cost Surcharge

This portion of the surcharge will recover the non-recurring shared costs incurred by the LNPA. These costs should be recovered from all end-users, regardless of whether they currently have the ability to have their number ported. Eventually number portability will be available to all telecommunications consumers, therefore, CBT believes that it is appropriate that all end-users contribute towards the recovery of the non-recurring shared costs involved in establishing number portability. CBT recommends that these costs be recovered over five years.[13] Each LNPA will recalculate the surcharge annually based upon updated estimates of the number of telephone numbers assigned to consumers in the region. This surcharge amount will be certified to each local exchange carrier and CMRS provider in the region for collection via the customer's monthly bill.

2) Recurring Shared Cost Surcharge

The recurring shared cost surcharge should only be collected from customers who have the ability to have their numbers ported. Annually, the LNPA will estimate its total recurring costs for the upcoming year and the monthly surcharge necessary to recover those costs from consumers in the region who will have the ability to have their numbers ported during the upcoming year. The surcharge would be collected by a carrier when it begins offering number portability.

The estimated recurring costs should include all administrative expenses as well as total estimated uploading and query costs for the upcoming year. Total query costs should be

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[13] Traditionally, non-recurring costs would be recouped via a one-time charge, however, because of the magnitude of the number portability non-recurring costs (both shared and carrier-specific), CBT recommends a five year recoupment period for all non-recurring costs, plus the cost of capital for carrying the charge during this amortization period.

estimated assuming there is a regional SCP and that all carriers use the regional SCP (i.e., carriers do not download to their own SCP).[14]

3) Pooled Carrier Cost Surcharge

This component will recover all non-recurring carrier-specific costs over five years.[15] As with the non-recurring shared costs surcharge, recovery should be from all end-user customers. Each carrier providing local service would report its costs to the LNPA by the date it begins providing number portability in the region. Quarterly reports would be filed thereafter. Carriers would be required to identify the type of costs (i.e., hardware, software, other) in sufficient detail as required by the LNPA, including the method used to assign a portion of network upgrade costs to number portability. The LNPA would set the surcharge for its region for the upcoming year based upon total costs reported by all carriers in the region as of the third quarter of the current year. The surcharge amount would be certified to each local exchange carrier and CMRS provider in the region for collection via the customer's monthly bill.

B. Customer Bills

All end-user customers will be assessed the non-recurring shared cost and pooled carrier cost surcharge on their monthly bills. Because the surcharge will be based on the number of telephone numbers, customers with more than one number will have a surcharge for each number. The amount of the surcharge will vary by LNP region. In addition, customers who

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[14] This does not prevent carriers from using their own SCP. It simply estimates shared costs assuming that all query costs are incurred by the LNPA's SCP. Downloading charges set by the LNPA should equal the estimated revenue the LNPA would forgo in query charges when a carrier uses its own SCP, therefore, this method eliminates the need to estimate downloading costs separately.

[15] See footnote 13.

have the ability to have their numbers ported will be assessed the recurring shared cost surcharge on a per number basis each month. Carriers must explicitly identify the surcharge on customer bills as a number portability surcharge. Carriers that offer number portability should show only the total surcharge amount per number (i.e., the surcharge should not be split into its various components.)

C. Settlement of Balances Due LNPA and Carriers

The LNPA will certify to each carrier providing number portability the amount of its carrier-specific costs it is eligible to recover each quarter based upon the costs reported to the LNPA. Each LNPA will establish quarterly settlement procedures by which carriers will remit to the LNPA amounts collected in excess of their eligible cost recovery for the previous quarter. Carriers whose eligible cost recovery for the previous quarter is greater than the amount collected will be reimbursed by the LNPA for the shortfall.

Recovery of number portability costs using an end-user surcharge has several advantages over other methods. First, as noted previously, it is competitively neutral. Since all carriers will recover their costs, no carrier has an incremental cost advantage over another. Furthermore, because all consumers in a region who have the ability to have their numbers ported will be assessed the same monthly surcharge, there can be no possibility that carriers can use number portability to gain a competitive advantage. Second, it adds predictability that an allocation method, particularly one based on gross telecommunications revenue, cannot provide. Third, a flat rate surcharge provides predictability for consumers. A surcharge collected as a percent of the monthly bill or per call could vary significantly from month to month and customer to customer. Also a surcharge collected as a percentage of the monthly bill would vary depending upon the rates charged by each carrier which would then make the number portability surcharge a factor in carrier selection.

IV. Conclusion

CBT believes a mandatory end-user surcharge is the only competitively neutral method by which to recover number portability costs. This surcharge should be set at a level sufficient to recover all shared costs and <u>all</u> carrier-specific costs attributable to number portability. Any cost recovery method that does not allow carriers to recover all of their costs may result in an unconstitutional taking of property.

Respectfully submitted,

Christopher J. Wilson
FROST & JACOBS
2500 PNC Center
201 East Fifth Street
Cincinnati, Ohio 45202
(513) 651-6800

Thomas E. Taylor
Sr. Vice President-General Counsel
Cincinnati Bell Telephone Company
201 East Fourth Street, 6th Floor
Cincinnati, Ohio 45202
(513) 397-1504

Attorneys for Cincinnati Bell
Telephone Company

Dated: August 16, 1996

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that copies of the foregoing **Comments of Cincinnati Bell Telephone Company** have been delivered by first class United States Mail, postage prepaid, on August 16, 1996, to the persons on the attached service list.

Amy K. Collins

Amy K. Collins

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William F Caton, Acting Secretary
Federal Communications Commission
1919 M Street NW Room 222
Washington DC 20554

International Transcription Services Inc
2100 M Street NW Suite 140
Washington DC 20337

Charles H Helein
Helein & Associates
ACTA
8180 Greensboro Drive Suite 700
McLean VA 22102

Mark Stachiw
AirTouch Paging
Tree Forest Plaza
1221 Merit Drive Suite 800
Dallas TX 75251

Northrop Johnston
Paul Hastings Janofsky & Walker
AirTouch Paging/Arch Communications Group
1299 Pennsylvania Ave NW 10th Floor
Washington DC 20004-2400

Robert M Gurss
Wilkes Artis Hedrick & Lane
APCO
1666 K Street NW Suite 1100
Washington DC 20006

Clifford K Williams
AT&T Corporation
205 North Maple Avenue
Basking Ridge NJ 07920

Policy and Program Planning Division
Federal Communication Commission
1919 M Street NW Room 544
Washington DC 20037

Competitive Pricing Division
Common Carrier Bureau
1919 M Street NW Room 518
Washington DC 20554

Werner K Hartenbeger
Dow Lohnes & Albertson
AD HOC
1255 Twenty Third Street NW Suite 500
Washington DC 20037

Carl W Northrop
Bryan Cave
AirTouch
700 13th Street NW Suite 700
Washington DC 20005

Larry A Peck
Ameritech
2000 West Ameritech Center Dr Rm 4H86
Hoffman Estates IL 60196-1025

Richard J Metzger
Associates for Local
Telecommunications Services
1200 19th Street NW Suite 560
Washington DC 20036

John T Scott III
Crowell & Moring
Bell Atlantic NYNEX Mobile Inc
1001 Pennsylvania Avenue NW
Washington DC 20004-2595

Betsy L Anderson
Bell Atlantic
1320 N Court House Road
Arlington VA 22201

David L Kahn
Bellatrix International
4055 Wilshire Blvd Suite 415
Los Angeles CA 90010

Jim O Llewellyn
BellSouth Corporation
1155 Peachtree Street NW Suite 1800
Atlanta GA 30309-3610

Virginia J Taylor
California Department of Consumer Affairs
400 R Street Suite 3090
Sacramento CA 95814-6200

Gardner Yanowitz Sinsheimer Johns
California Cable Television Association
4341 Peidmont Avenue
Oakland CA 94611

Donna N Lampert
Mintz Levin Cohn Ferris Glovsky
CCTA
701 Pennsylvania Avenue NW Suite 900
Washington DC 20004

Michael Altschul
Cellular Telecommunications
Industry Association
1250 Connecticut Avenue NW Suite 200
Washington DC 20036

Ellen S Deutsch
Citizens Utilities Company
8100 Northwest Parkway Drive Suite 150
Vancouver WA 98662

Joel H Levy
Cohn & Marks (NWRA)
1333 New Hampshire Avenue NW Suite 600
Washington DC 20036

Christopher W Savage
Cole Raywid & Braverman (Jones)
1919 Pennsylvania Avenue NW Suite 200
Washington DC 20006

Werner K Hartenberger
Dow Lohnes & Albertson
Cox Enterprises Inc
1200 New Hampshire Ave NW Suite 800
Washington DC 20037

James R Hobson
Donelan Cleary Wood & Maser
1100 New York Avenue NW Suite 750
Washington DC 20005-3934

David C Jatlow
Young & Jatlow
Ericsson Corporation
2300 N Street Suite 600
Washington DC 20037

Glenn S Richards
Fisher Wayland Cooper Leader &
Zaragoza (TIA)
200 Pennsylvania Avenue NW Suite 400
Washington DC 20006

Cynthia B Miller
Florida Public Service Commission
Gunter Building
2540 Shumard Oak Boulevard Room 301
Tallahassee FL 32399-0850

Michael J Ettner
General Services Administration
18th & F Streets NW Room 4002
Washington DC 20405

Kathy L Shobert
General Communication Inc
901 15th Street NW Suite 900
Washington DC 20005

Darren L Nunn
Ginsburg Feldman and Bress (ISA)
1250 Connecticut Avenue NW
Washington DC 20036

Leo R Fitzsimon
GO Communications Corporation
201 N Union Street Suite 410
Alexandria VA 22314

Jeffrey S Linder
Wiley Rein & Fielding
GTE Service Corporation
1776 K Street NW
Washington DC 20006

David J Gudino
GTE Service Corporation
1850 M Street NW Suite 1200
Washington DC 20036

Robert C Schoonmaker
GVNW Inc Management
2270 LA Montana Way
Colorado Springs CO 80918

Melanie Haratunian
Halprin Temple Goodman & Sugrue (YPPA)
1100 New York Avenue NW Suite 650 East Tower
Washington DC 20005

Richard S Wolters
Illinois Commerce Commission
527 East Capitol Avenue
PO Box 19280
Springfield IL 62794-9280

Sam LaMartina
Independent Telecommunications
Network Inc
8500 W 110th Street Suite 600
Overland Park KS 66210

Danny E Adams
Steven A. Augustino
Kelley Dry & Warren
1200 19th Street NW Suite 500
Washington DC 20036

Margot Smiley Humphrey
Koteen & Naftalin (TDS)
1150 Connecticut Avenue NW Suite 1000
Washington DC 20036

Richard F Nelson
Marion County BD/County Commissioners
911 System Support Department
263 SE 3rd Street
Ocala FL 34471-9101

Loretta J Garcia
MCI Telecommunications Corporation
1801 Pennsylvania Avenue NW
Washington DC 20006

Andrew D Lipman
Swidler & Berlin
MFS Communications Inc
3000 K Street NW
Washington DC 34471-9101

Lampert Harris
Mintz Levin Cohn Ferris Glovsky
701 Pennsylvania Avenue NW Suite 900
Washington DC 20004

Roger W Steiner
Missouri Public Service Commission
PO Box 360
Jefferson City MO 65102

Gene P Belardi
MobileMedia Communications Inc
2101 Wilson Boulevard Suite 935
Arlington VA 22201

Paul Rodgers
NARUC
1102 ICC Building PO Box 684
Washington DC 20044

Neal M Goldberg
National Cable Television Association Inc
1724 Massachusetts Avenue NW
Washington DC 20036

David Cosson
National Telephone Cooperative Association
2626 Pennsylvania Avenue NW Suite 1001
Washington DC 20037

Richard A Askoff
NECA
100 South Jefferson Road
Whippany NJ 07981

Maureen O Helmer
New York State Department
of Public Service
Three Empire State Plaza
Albany NY 12223-1350

Lawrence R Krevor
Nextell Communications Inc
800 Connecticut Avenue NW Suite 1001
Washington DC 20006

Sydney R Peterson
Niagra Telephone Company
1133 Main Street
Niagra WI 54151-0003

Maureen F Thompson
Deborah Haraldson
NYNEX
1095 Avenue of the Americas
New York NY 10036

Mark J O'Connor
Piper & Marbury
Omnipoint
1200 19th Street NW 7th Floor
Washington DC 20036

Lisa M Zaina
OPASTCO
21 Dupont Circle NW Suite 700
Washington DC 20039

Theresa L Cabral
Pacific Bell
140 New Montgomery Street Room 1526
San Francisco CA 94105

Jeffrey S Linder
Wiley Rein & Felding
Pacific Bell
1776 K Street NW
Washington DC 20006

John W Hunter
Reed Smith Shaw & McClay
PageNet
One Franklin Square Suite 1100 East Tower
Washington DC 20005

William L Roughton
PCS PrimeCo
1133 20th Street NW
Washington DC 20036

Ann E Henkener
Public Utilities Commission Of Ohio
180 E Broad Street
Columbus OH 43215-3793

Ellen S LeVine
Public Utilities Commission of California
505 Van New Avenue
San Francisco CA 94102

Pat Wood III
Public Utility Commission of Texas
7800 Shoal Creek Blvd
Austin TX 78757

Mary W Marks
SBC Communications Inc
175 E Houston Room 1262
San Antonio TX 78205

Gordon F Scherer
Scherers Communication Group Inc
575 Scherers Court
Worthington OH 43085

Norina T Moy
Sprint Corporation
1850 M Street NW Suite 1110
Washington DC 20036

Mary Mack Adu
State of California and the Public utilities
Commission of State of California
505 Van Ness Avenue
San Francisco CA 94102

Charles C Hunter
Hunter & Mow
Telecommunications Resellers Association
1620 I Street NW Suite 701
Washington DC 20006

Victoria A Schlesinger
Telemation International Inc
6707 Democracy Blvd
Bethesda MD 20817

J Manning Lee
Teleport Communication Group Inc
Two Teleport Drive Suite 300
Staten Island NY 10311

Richard A Muscat
Texas Advisory Commission
on State Emergency (TX-ACSEC)
PO Box 12548 Capitol Station
Austin TX 78711-2548

Sue D Blumenfeld
Willkie Farr & Gallagher(Time Warner)
Three Lafayette Center
1155 21st Street NW
Washington DC 20036

Jere W Glover
United States Small Business Administration
409 Third Street SW Suite 7800
Washington DC 20416

Charles D Cosson
United States Telephone Association
1401 H Street NW Suite 600
Washington DC 20005

Thomas J Moorman
Kraskin & Lesse
US INTELCO
2120 I Street NW Suite 520
Washington DC 20037

Jeffrey S Bork
US West Inc
1020 19th Street NW Suite 700
Washington DC 20036

Pamela Portin
US Air Waves Inc
10500 NE 8th Street Suite 625
Bellevue WA 98004

BB Knowles
Utilities Division of Georgia
Public Service Commission
244 Washington Street SW
Atlanta GA 30334-5701

Richard S Whitt
WorldCom Inc d/b/a LDDS WorldCom
1120 Connecticut Avenue NW Suite 400
Washington DC 20036